

1 LATHAM & WATKINS LLP
2 Marvin S. Putnam (Bar No. 212839)
3 *marvin.putnam@lw.com*
4 Laura R. Washington (Bar No. 266775)
5 *laura.washington@lw.com*
6 10250 Constellation Blvd., Suite 1100
Los Angeles, California 90067
Telephone: +1.424.653.5500
Facsimile: +1.424.653.5501

7 *Attorneys for Defendants*
8 Netflix, Inc., and Netflix Worldwide
 Entertainment, LLC

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

12 FIONA HARVEY,
13 Plaintiff,
14 v.
15 NETFLIX, INC., and NETFLIX
16 WORLDWIDE ENTERTAINMENT,
17 LLC,
18 Defendants.

| Case No. 2:24-cv-04744-RGK-AJR

**[PROPOSED] ORDER GRANTING
DEFENDANTS NETFLIX, INC. AND
NETFLIX WORLDWIDE
ENTERTAINMENT, LLC'S REQUEST
FOR JUDICIAL NOTICE IN SUPPORT
OF MOTION TO DISMISS
COMPLAINT**

Date: September 3, 2024
Time: 9:00 a.m.
Place: Courtroom 850

Hon. R. Gary Klausner

[PROPOSED] ORDER

Based on defendants Netflix, Inc. and Netflix Worldwide Entertainment, LLC's Request for Judicial Notice in Support of Motion to Dismiss the Complaint filed by plaintiff Fiona Harvey, and for good cause appearing for the entry thereof, IT IS HEREBY ORDERED that the Court will take judicial notice of:

1. **Exhibit A:** a screen capture of the YouTube page for Harvey's May 9, 2024 interview on *Piers Morgan Uncensored*, accessed on July 27, 2024;
 2. **Exhibit B:** the article titled "MP wife's stalker; lawyer Laura tells of fired trainee's hate campaign" (McPherson, Lynn; *Sunday Mail*, January 30, 2000;
<https://www.thefreelibrary.com/MP+WIFE%27S+STALKER%3B+Lawyer+Laura+tells+of+fired+trainee%27s+hate...-a061570268>, last accessed July 23, 2024);
 3. **Exhibit C** the article titled "I'VE GOT A LONG WRRAY TO GO YET; MP Jimmy Wray talks for the first time about his stroke, his family and the condition that blights his littleboy's progress" (Brown, Annie; *Daily Record*, March 3, 2004;
<https://www.thefreelibrary.com/I%27VE+GOT+A+LONG+WRRAY+TO+GO+YET%3B+MP+Jimmy+talks+for+the+first+time...-a0113836577>, last accessed July 23, 2024);
 4. **Exhibit D:** the article titled "'Real-life' Baby Reindeer stalking Fiona Harvey was on police watchlist over 'sinister' campaign against Sir Keir Starmer" (Sullivan, Mike; *The Sun*, May 20, 2024;
<https://www.thesun.co.uk/news/28035155/fiona-harvey-police-watchlist-keir-starmer-emails/>, last accessed July 23, 2024);
 5. **Exhibit E:** the article titled "Baby Reindeer fans float theory that Richard Gadd's stalker 'Martha Scott' might have been a man in real

1 life – as they point out all the clues in the hit Netflix series” (Taylor,
2 Jessica; *MailOnline*, April 23, 2024;
3 <https://www.dailymail.co.uk/femail/article-13339871/Baby-Reindeer-fans-float-theory-Richard-Gadds-stalker-Martha-Scott-man-real-life-point-clues-hit-Netflix-series.html>, last accessed July 27, 2024);
4 6. **Exhibit F:** the article titled “Baby Reindeer: Has Richard Gadd's real
5 stalker been revealed?” (Phillipson, Daisy; May 1, 2024;
6 <https://www.dexerto.com/tv-movies/baby-reindeer-has-richard-gadd-real-stalker-revealed-2655346/>, last accessed July 23, 2024);
7 7. **Exhibit G:** the article titled “Labour inquiry follows selection
8 meeting” (*The Herald*, September 5, 2000;
9 <https://www.heraldscotland.com/news/12163265.labour-inquiry-follows-selection-meeting/>, last accessed July 23, 2024);

10 The Court takes notice of the aforementioned exhibits on the grounds that
11 their existence and contents are not subject to reasonable dispute. *See Whitaker v.*
12 *Fortuna Enterprises, L.P.*, 2021 WL 4260606, at *2 n.2 (C.D. Cal. May 21, 2021);
13 *Threshold Enterprises LTD. V. Pressed Juicery, Inc.*, 445 F.Supp.3d 139, 146
14 (N.D. Cal. 2020); *In re Bofl Holding, Inc. Secs. Litig.*, 2018 WL 1410729, at *7 n.5
15 (S.D. Cal. Mar. 21, 2018); *In re Am. Apparel, Inc. v. Shareholder Litig.*, 855 F.
16 Supp. 2d 1043, 1060-62 (C.D. Cal. 2012).
17
18

19 **IT IS SO ORDERED.**
20
21

22 Dated: _____, 2024
23

24 _____
25 Hon. R. Gary Klausner
26 United States District Judge
27
28